

# Federal Defenders OF NEW YORK, INC.

Southern District  
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January 21, 2020

**VIA ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Miguel Angel Martinez**  
**19 Cr. 681 (NRB)**

Dear Judge Buchwald:

I write, with the consent of Pretrial Service and with no objection from the Government, to respectfully request that the Court modify the conditions of Mr. Martinez's bail to remove the condition of home detention and, instead, impose a curfew monitored by location monitoring.

On September 6, 2019, Magistrate Judge Netburn imposed bail conditions, including the following: a \$100,000 personal recognizance bond to be cosigned by four financially responsible persons and secured by \$1,000; travel restricted to the Southern and Eastern Districts of New York; home detention; that Mr. Martinez reside with his mother, and that she serve as a third-party custodian; and the surrender of travel documents with no new applications. These conditions were modified by Magistrate Judge Cott on September 9, 2019 to changing the place of residence to Mr. Martinez's sister's home. Mr. Martinez has been in full compliance with the conditions previously imposed.

This request is made so that Mr. Martinez can accept a new job opportunity doing maintenance at a residential building. This new employment will pay Mr. Martinez in cash, which I understand from Mr. Martinez' Pretrial Service's officer, Bernisa Mejia, is incompatible with the job requirements of home detention.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio  
Assistant Federal Defender  
Tel.: (212) 417-8782

cc: AUSA Emily Johnson  
PTSO Bernisa Mejia (via email)

*Application  
presented  
Naomi  
Reice  
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2/24/20*